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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH**

RANDY MERRILL, an individual;
ELIZABETH MERRILL, an individual; and
RL-SALES, LLC, a Utah Limited Liability
Company,

Plaintiffs,

vs.

SCOTTSDALE INSURANCE COMPANY,
a Delaware corporation, d/b/a
NATIONWIDE; and DOES I-X,

Defendants.

**MOTION FOR LEAVE TO FILE
UNDER SEAL EXHIBIT “A” OF
PLAINTIFFS’ RESPONSE TO [70] [75]
SHORT FORM DISCOVERY MOTION
ON INSURANCE DOCUMENTS,
DOCUMENT [101]**

Case No: 2:20-CV-00064-DB-DAO
District Judge David Barlow
Magistrate Judge Daphne A. Oberg

On March 11, 2021, Plaintiffs filed a Response to Defendant’s Short Form Discovery Motion On Insurance Documents, [101], with an attached Exhibit A. Exhibit A of that response was submitted with redactions, protecting information identified by Plaintiffs as being confidential.

The exhibit includes multiple references to Plaintiffs’ current insurers, including the name of an insurance agent. Plaintiffs’ rely upon the continued existence of liability insurance to support

their business practices as an internet retailer of batteries. See *Plaintiffs' Motion to Seal as Confidential Documents Filed with the Court* [91]. Interference with Plaintiff's insurance coverage can have an immediate and harmful effect on their business operations. (*id.*) As such, Plaintiffs have designated information relating to their current and ongoing insurance providers as confidential to protect the business operations of RL-Sales, LLC.

Therefore, Plaintiffs seek leave to file Exhibit A of Plaintiffs' Response to Defendant's Short Form Discovery Motion On Insurance Documents [101] under seal.

DATED this 12th day of March, 2021.

BEARNSON & CALDWELL

/s/Aaron K. Bergman
Aaron K. Bergman
Attorney for Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on the 12th day of March, 2021, a copy of the foregoing **MOTION FOR LEAVE TO FILE UNDER SEAL EXHIBIT “A” OF PLAINTIFFS’ RESPONSE TO [70] [75] SHORT FORM DISCOVERY MOTION ON INSURANCE DOCUMENTS, DOCUMENT [101]** was served on the following named person(s) via Email at the addresses shown below:

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Company, d/b/a Nationwide*

/s/Kenny Glodo
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